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9/27/1991

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 27, 1991

Catherine Buller  
Chemical Processors Inc.  
2203 Airport Way South  
Suite 400  
Seattle, WA 98134

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RCRA PERMITS SECTION

FILE COPY

Re: Draft Demonstration of Applicability of Closure Analyses for  
the Pier 91 facility.

Dear Ms. Buller:

The Department has reviewed Chempro's draft demonstration supporting the use of an abbreviated list of analyses during facility closure. The Department agrees in principle that, owing to the limited number of wastes handled at the Pier 91 facility, full Appendix VIII analysis for all closure samples may not be necessary. However, the current application, as supported by the draft demonstration, will require some clarification before Ecology can find the closure plan acceptable.

Specific comments on the draft demonstration are enclosed. Chempro should respond with a revised closure plan to be incorporated into the Permit Application. Please provide the revised pages within 30 days of receipt of this letter. As I told you on the phone recently, it is our intent to issue a preliminary draft of the Pier 91 Permit shortly. Until Ecology has an acceptable revised Chempro closure plan, the Draft Permit language will require full Appendix VIII analysis.

Please note that should Chempro begin receiving different wastes at the Pier 91 facility in the future, the Department may require modification of the closure sampling and analysis plan. Should you have any further questions in this matter please call me at 459-6993.

Sincerely,

Douglas Brown  
Hazardous Waste Permits

Enclosure

cc: David Aggerholm, Port of Seattle  
Carrie Sikorski, EPA Region 10  
Julie Sellick, NWRO

USEPA RCRA  
3012280

Comments on  
The Draft Demonstration for Facility Closure Analyses  
for the Pier 91 Facility

1. Specify the analytical techniques that will be used for each group of analytes; volatiles, semi-volatiles, total metals, etc. Ecology realizes that analytical techniques are likely to change between now and the actual time of closure, however, the permit application should indicate the methodologies that would be used if closure were to occur now. Should approved methodologies for these analyses change, this will be addressed through the permit modification process.
2. Specify the compounds for which samples will be tested. Justify these selections based upon waste streams historically and currently handled at the facility. Provide clear rationale for the selections and sufficient detail so that Ecology can evaluate them. The Draft Closure Analysis Demonstration discusses concentration and mobility as factors in the selection of compounds. Environmental persistence must also be considered when developing the list.
3. State explicitly that analysis for Appendix VIII constituents in background samples must be performed by the same methods as currently proposed for closure sample analyses.